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August 18, 2015

Via Facsimile (212) 857-2346

The Honorable Denny Chin
 United States Circuit Judge
 United States Courthouse
 40 Foley Square
 New York, NY 10007-1502

Re: *Sykes, et al. v. Mel S. Harris and Associates LLC, et al.*, 09 Civ. 8486 (DC)

Dear Judge Chin:

This firm, along with co-counsel MFY Legal Services and the New Economy Project, represents Plaintiffs and the Class in the above-referenced action. We write to respectfully request an extension of time from August 20, 2015 to September 11, 2015 to file a motion for preliminary approval of the settlement with the Leucadia Defendants. This extension is necessary because (1) Judge Ellis has asked the Non-Settling Defendants and Plaintiffs to submit additional briefing on August 20, 2015, so Plaintiffs will not know until after August 20 if a settlement with the Non-Settling Defendants is possible; and (2) the independent mediator Judge Weinstein is reviewing the proposed allocation plan and would benefit from additional time to do so. A shorter extension is not workable due to Plaintiffs' counsels' previously scheduled extension. The Leucadia Defendants consent to this request for an extension.

We thank the Court for its consideration of these matters and are available should the Court have any questions or concerns.

Approved.
 SO ORDERED.

USCT

Sincerely,

Debra L. Greenberger

c. All Counsel of Record, via email

8-24-2015